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19
20 UNITED STATES DISTRICT COURT
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22 NORTHERN DISTRICT OF CALIFORNIA
23
24 SAN JOSE DIVISION

25 UNITED STATES OF AMERICA,
26 Plaintiff,
27 vs.
28 JONATHAN CHANG & WEILIN CHANG,
29 Defendants.

Case No. 16-cr-00047 EJD

**DEFENDANTS JONATHAN & WEILIN
CHANG'S PROPOSED COURT JURY
QUESTIONNAIRE WITH ADDED
RELIGION AND RACE QUESTIONS**

30 The defense respectfully submits the Court's standard jury questionnaire with the additional
31 religion, race or ethnicity, and national origin questions discussed at the July 31, 2019 pretrial
32 conference.

33 Dated: AUGUST 2, 2019

Respectfully submitted,

34 _____ /s/
35 Christopher J. Cannon
36 Matthew A. Laws
37 Attorneys for WEILIN CHANG

38 _____ /s/
39 Julia M. Jayne
40 Attorney for JONATHAN CHANG

DEFENDANTS JONATHAN & WEILIN CHANG'S PROPOSED COURT JURY QUESTIONNAIRE WITH ADDED
RELIGION AND RACE QUESTIONS

Case No. 16-cr-00047 EJD

JUROR QUESTIONNAIRE

1. NAME: _____ Dr. Mr. Mrs. Ms. Miss Age: _____

2. Residence: County: _____ City/Town: _____ Neighborhood: _____
[Do not list your street address]

How long have you lived at that location? _____

Your place of birth: _____

Do you own or rent your home? Rent _____ Own _____ Other _____

What other communities have you lived during the last ten years? _____

3. What is your marital status: (please circle)

Single Married Separated Divorced Widowed Live with a partner

Any prior marriages? Yes _____ No _____ If Yes, how many? _____

4. What is your current job status?

_____ Working full-time	_____ Unemployed
_____ Working part-time	_____ Homemaker
_____ Retired	_____ Full-time student
_____ Disabled	

5. What is your occupation? [PLEASE NOTE: If you are currently not employed, retired, disabled or a homemaker, please describe your most recent prior employment]

a. What is your occupation (or what was it, if not currently employed)?

b. By whom are (were) you employed? _____

c. How long have (did) you worked there? _____

d. Please describe the nature of your job. _____

e. Do (Did) you supervise other people? Yes _____ No _____ If so, how many? _____

6. What is the highest level of education you completed? _____

7. Please describe your educational background:

Major areas of study Degrees received

Please complete regarding your **present spouse or partner**. If you are widowed, divorced or separated, please answer all the following questions regarding your **former spouse/partner**.

8. Current employment status:

_____ Working full-time	_____ Unemployed	_____ Disabled
_____ Working part-time	_____ Homemaker	
_____ Retired	_____ Full-time student	

a. What is his/her occupation (or what was it, if retired or unemployed or disabled)? _____

b. By whom is (was) s/he employed? _____

How long has (did) s/he worked there? _____

c. Please describe the nature of his/her job? _____

d. What other types of jobs has s/he had in the past? _____

9. What is the highest level of education she/he completed? _____

Please describe her/his educational background, including vocational school(s) and/or college(s) attended:

Major areas of study

Degrees received

10. If you have children, please state:

Sex

Age

Education

Occupation

11. If other adults live in your home in addition to those already you already described above, please state:

Relationship

Sex

Age

Education

Occupation

12. What are your hobbies, major interests, recreational pastimes and spare-time activities and sports?

13. Please list all groups and organizations you belong to or participate in, including but not limited to service, community and neighborhood groups; crime prevention groups; volunteer activities; and groups concerned with the criminal justice system.

14. Please list your main sources of news -- including newspapers, television and radio stations or programs, internet sites and conversations with others:

15. Have you previously served as a trial juror or as a grand juror? Yes _____ No _____
If yes, please complete for each case on which you served:

Civil or Criminal	Nature of case (i.e., robbery or personal injury)	When/Where?	Verdict reached? (yes or no)
1			
2			
3			
4			
5			

a. Have you ever served as a jury foreperson? Yes _____ No _____
b. Is there any reason that your prior jury service would affect your ability to be fair, objective and impartial to both sides at trial? Yes _____ No _____ If Yes, please explain:

16. Is there anything about your experiences, opinions or beliefs about race, color, immigration status, national origin, ethnicity, sex or sexual orientation which would strongly influence your ability to judge the facts of a criminal case or the person accused? Yes _____ No _____
If yes, please explain:

17. Do you understand, speak, read, or write Mandarin?

a. Understand Mandarin? _____ Yes _____ No
b. Speak Mandarin? _____ Yes _____ No
c. Read Mandarin? _____ Yes _____ No
d. Write Mandarin? _____ Yes _____ No

18. Are you a member of any church or religious organization? If yes, please list and identify any leadership roles. Yes _____ No _____ If yes, please describe: _____

19. Do you have any strong feelings about organized religion?
Yes _____ No _____ If yes, please explain: _____

20. Do you donate to any religious organizations?
Yes _____ No _____ If yes, please list: _____

21. Are there any stereotypes you have heard about people of Chinese or Taiwanese ancestry that you believe are correct or have a grain of truth to them?
Yes _____ No _____ If yes, please describe: _____

22. Have you ever had any negative experiences with a person of Chinese or Taiwanese ancestry, or with a company based in China or Taiwan?
Yes _____ No _____ If yes, please describe: _____

23. Have you ever had a significant negative experience involving a person of Chinese descent that you believe would not have occurred had the person been of a different background?
Yes _____ No _____ If yes, please describe: _____

24. Do you have any opinions or knowledge about the attitudes of Chinese immigrants toward law enforcement in the United States?
Yes _____ No _____ If yes, please describe: _____

25. Do you have any experiences, views, or beliefs that would prevent you from being fair and impartial in a trial involving people of Chinese or Taiwanese ancestry?
Yes _____ No _____ If yes, please explain: _____

26. This case involves the activities of a Christian church and several non-profit organizations. Is there anything about this subject matter that would cause you to hesitate participating as a juror in this case?
Yes _____ No _____ If yes, please explain: _____

27. The court will instruct you on the laws and your duties as jurors. Will you be able to follow these instructions even if you disagree with them? Yes _____ No _____ If No, please explain:

28. Is there any matter not covered by this questionnaire that should be brought to the attention of the court and the lawyers because it might affect your ability to be a fair and impartial juror?

Yes _____ No _____ If Yes, please explain:

29. Is there any matter you would prefer to discuss privately with the court?

Yes _____ No _____ If Yes, please explain:

JUROR'S OATH

I declare under penalty of perjury that the answers set forth in this Jury Questionnaire are true and correct to the best of my knowledge and belief. I have not discussed my answers with others, or received assistance in completing this questionnaire.

Signature: _____

Print Name: _____

Date: _____

Further Explanation Sheet

(Please put the question number next to your response. Thank you)